

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

EPIC SYSTEMS CORPORATION, a
Wisconsin Corporation;

Plaintiff,

v.

TATA CONSULTANCY SERVICES
LIMITED, an Indian Corporation;
and TATA AMERICA INTERNATIONAL
CORPORATION (dba TATA AMERICA), a
New York Corporation;

Defendants.

Case No. 14-CV-748-wmc
Oral Argument Requested

**NOTICE OF DEFENDANTS' MOTION TO
DISMISS PLAINTIFF'S AMENDED COMPLAINT**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 12(b)(6) and 9(b) and upon the accompanying memorandum of law, dated February 9, 2015, and Declaration of Philip D. Robben, dated February 9, 2015, and the exhibits attached thereto, Defendants Tata Consultancy Services Limited and Tata America International Corporation will move this Court at the United States Courthouse for the Western District of Wisconsin, 120 North Henry Street, Madison, Wisconsin 53703, at such time as the Court may direct, for an Order dismissing Plaintiff's Amended Complaint for failure to state a claim upon which relief can be granted, and granting Defendants such other and further relief as the Court deems just and proper.

Dated: February 9, 2015

By: s/Philip D. Robben
Philip D. Robben
Melissa E. Byroade
KELLEY DRYE & WARREN LLP
101 Park Avenue
New York, NY 10178
Email: probben@kelleydrye.com
Email: mbyroade@kelleydrye.com
Phone: (212) 808-7800
Fax: (212) 808-7897

David W. Long
KELLEY DRYE & WARREN LLP
Washington Harbour, Suite 400
3050 K Street NW
Washington, D.C. 20007
Email: dlong@kelleydrye.com
Phone: (202) 342-8400
Fax: (202) 342-8451

and

s/ Barbara A. Neider
Barbara A. Neider
Meg Vergeront
STAFFORD ROSENBAUM LLP
222 West Washington Avenue, Suite 900
P.O. Box 1784
Madison, WI 53701-1784
Email: bneider@staffordlaw.com
Email: mvergeront@staffordlaw.com
Phone: (608) 256-0226
Fax: (608) 259-2600

*Attorneys for Defendants Tata Consultancy
Services Limited and Tata America
International Corporation*